

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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IN RE AUTOMOTIVE PARTS  
ANTITRUST LITIGATION

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In Re: Instrument Panel Clusters : 2:12-cv-00200  
In Re: Fuel Senders : 2:12-cv-00300  
In Re: Heater Control Panels : 2:12-cv-00400  
In Re: Alternators : 2:13-cv-00700  
In Re: Windshield Wipers : 2:13-cv-00900  
In Re: Radiators : 2:13-cv-01000  
In Re: Starters : 2:13-cv-01100  
In Re: Ignition Coils : 2:13-cv-01400  
In Re: Motor Generators : 2:13-cv-01500  
In Re: HID Ballasts : 2:13-cv-01700  
In Re: Inverters : 2:13-cv-01800  
In Re: Fuel Injection Systems : 2:13-cv-02200  
In Re: Power Window Motors : 2:13-cv-02300  
In Re: Automatic Fluid Transmission Warmers : 2:13-cv-02400  
In Re: Valve Timing Control Devices : 2:13-cv-02500  
In Re: Air Conditioning Systems : 2:13-cv-02700  
In Re: Windshield Washer Systems : 2:13-cv-02800  
In Re: Spark Plugs : 2:15-cv-03000

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THIS DOCUMENT RELATES TO:  
AUTOMOBILE DEALERSHIP ACTIONS  
END-PAYOR ACTIONS

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**STIPULATION AND ORDER REGARDING END-PAYOR AND  
AUTOMOBILE DEALERSHIP PLAINTIFFS' MOTION TO  
CONSOLIDATE CLAIMS AND AMEND COMPLAINTS**

WHEREAS, End-Payor ("EPPs") and Automobile Dealership Plaintiffs ("ADPs") (collectively, "Plaintiffs") have each filed consolidated amended class action complaints ("CACs") in the above-captioned cases against Defendants<sup>1</sup>;

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<sup>1</sup> "Defendants" collectively refers to the defendants in the above-captioned cases.

WHEREAS, per Local Rule 7.1(a)(1), since November 2015 Plaintiffs have invited all Defendants who have been served and appeared in the above-captioned cases to meet and confer concerning Plaintiffs' intention to file a motion to consolidate the claims in those cases and engaged in multiple meet and confers with those Defendants who agreed to meet and confer (certain Defendants declined to meet and confer at this time);

WHEREAS, during the course of said meet-and-confers, Plaintiffs have shared with Defendants a draft of an amended CAC that is substantively similar to the CACs that Plaintiffs will seek leave to file pursuant to the motion, and Defendants have not consented to the filing of such an amended CAC; and

WHEREAS, Plaintiffs will move the Court for an order consolidating EPP and ADP claims in the above-captioned cases against Defendants and seek leave to file a CAC on behalf of EPPs and a CAC on behalf of ADPs alleging claims against Defendants in the above-captioned cases as having engaged in a conspiracy to unlawfully fix and artificially raise the prices of automotive parts sold in the United States and elsewhere.

Defendants and Plaintiffs hereby stipulate to the following briefing schedule for the motion to consolidate claims and amend CACs:

1. Plaintiffs shall file their Motion to Consolidate Claims and Amend Complaints by December 18, 2015;
2. Defendants shall file their Oppositions to Plaintiffs' Motion to Consolidate Claims and Amend Complaints by January 25, 2016;
3. Plaintiffs shall file their Reply in Support of their Motion to Consolidate Claims and Amend Complaints by February 12, 2016;

4. Plaintiffs and Defendants request that the Court hear oral argument from Plaintiffs and Defendants on the Motion to Consolidate Claims and Amend Complaints as soon thereafter as it may be heard before the Honorable Marianne O. Battani.

**IT IS SO STIPULATED.**

DATED: December 31, 2015

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<sup>2</sup> Keihin Corp. has moved to dismiss, including for lack of personal jurisdiction. Its motion remains pending. Keihin Corp. does not waive and expressly reserves the right to argue any jurisdictional defense or any other defense.

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**IT IS SO ORDERED.**

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